

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO. 04-10581 NMG

YVETTE LOCKHART-BEMBERY,	)
Plaintiff	)
VS.	)
	)
TOWN OF WAYLAND POLICE DEPARTMENT,	)
ROBERT IRVING, in his capacity as CHIEF OF THE	)
WAYLAND POLICE DEPARTMENT and	)
DANIEL SAURO	)
Defendants	)

**DEFENDANTS' FURTHER MOTION FOR APPROVAL TO UTILIZE THE  
GENERAL GRANT OF ACCESS TO C.O.R.I. TO ATTORNEYS OF RECORD**

Now comes the Defendants in the above-entitled case and, acting pursuant to Mass. General Laws, Chapter 6 § 172 (c), requests the approval of this Honorable Court to utilize the general grant of access to C.O.R.I., as provided by the Criminal History System's Board, to attorneys of records for all criminal record information for the following additional potential witnesses in this case:

- (1) Robert Bembery, Sr., 48 Pasadena Road, Dorchester, Massachusetts.
- (2) Robert Bembery, Jr., 87 Georgetown Drive, Framingham, MA.
- (3) Mikala Bembery, 620 Hollis St., Framingham, MA

Defendants state that plaintiff's counsel has just recently added the above names to the plaintiff's list of witnesses for trial. This Court has recently granted the Defendants' previous request for CORI access for listed witnesses. The Defendants now move for CORI access to the newly named witnesses.

Defendants attach an affidavit of counsel in support of this Motion.

Respectfully submitted  
The Defendants  
By their attorneys,

/s/ Jeremy I. Silverfine  
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Date: January 18, 2006